

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and Bernard L.
Madoff,

Plaintiff,
v.

HELENE SAREN-LAWRENCE,
Defendant.

Adv. Pro. No.: 10-04898 (SMB)

**STIPULATION AND ORDER SETTING BRIEFING SCHEDULE ON THE TRUSTEE'S
MOTION FOR SUMMARY JUDGMENT**

The Plaintiff, Irving H. Picard, trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the estate of Bernard L. Madoff, individually (“Madoff”), and Defendant, Helene Saren-Lawrence (“Saren-Lawrence”), by and through their respective, undersigned counsel (collectively, the “Parties”), state as follows:

WHEREAS, the Court having held a Pre-Trial Conference (the “Conference”) on March 27, 2019 at 10:00 a.m., where the Trustee requested permission to file a Motion for Summary

Judgment (the “Motion”), and the Court having issued a bench ruling at the Conference permitting the Trustee to file such Motion and directing the Parties to discuss a schedule for briefing on the Motion; and

WHEREAS, the Parties conferred to prepare an agreed upon briefing schedule relating to the Motion.

NOW THEREFORE, the Parties agree and stipulate to the following:

1. the Trustee shall file and serve the Motion on or before July 12, 2019;
2. the Defendant shall file her response to the Motion on or before August 30, 2019;
and
3. the Trustee shall file his reply to the Defendant’s response to the Motion on or before September 30, 2019.

Dated: New York, New York
April 3, 2019

BAKER & HOSTETLER LLP

Of Counsel:

BAKER HOSTETLER LLP

811 Main, Suite 1100
Houston, Texas 77002
Telephone: (713) 751-1600
Facsimile: (713) 751-1717
Dean D. Hunt
Email: dhunt@bakerlaw.com

By: /s/ Nicholas J. Cremona
David J. Sheehan
Nicholas J. Cremona
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and for the Estate of Bernard
L. Madoff*

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman
Gregory M. Dexter
465 Park Avenue
New York, New York 10022
Phone & Fax : (888) 759-1114
hchaitman@chaitmanllp.com
gdexter@chaitmanllp.com

Attorneys for Defendants

SO ORDERED

Dated: April 8th, 2019
New York, New York

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE